

Frequently-Asked NRC Questions

BUDGET QUESTIONS:

Q 1. What is a project period? What is a budget period?

A project period is the total amount of time that the Department authorizes a grantee to complete the approved work of the project described in the grantee's application.

The NRC project period consists of three, twelve-month budget periods. A budget period is the approved twelve-month fiscal period for expending grant funds for approved activities.

The NRC FY 2000-02 project period will begin September 1, 2000 and will end August 31, 2003, unless otherwise specified in the grant document. The first budget period will begin on September 1, 2000 and will end on August 31, 2001, unless otherwise specified in the grant document.

Q 2. Which academic years correspond to which fiscal years (FY) for the FY 2000-02 project period?

The chart below lists the three budget period dates for the FY 2000-02 project period:

<i>Project Year</i>	<i>Academic Year</i>	<i>Fiscal Year</i>	<i>Budget Period</i>
1	2000-2001	2000	9/1/00-8/31/01
2	2001-2002	2001	9/1/01-8/31/02
3	2002-2003	2002	9/1/02-8/31/03

Q 3. Can I expend funds before the start of my grant?

Yes, if you have good reason to expect funding for your grant application, you may incur pre-award costs for allowable items and activities of your project up to 90 days before the beginning of your grant, without prior approval of program staff. However, the US/ED is under no obligation to reimburse you for any pre-award expenditure in the event that no grant is awarded or the grant award is for an amount less than expected.

Q 4. What is "Expanded Authorities" and how does it affect the NRC/FLAS grant?

Amendments to the Education Departments General Administrative Regulations (EDGAR) have given grantees greater flexibility in managing their projects, by eliminating the need for prior written approval from the Department for some changes grantees wish to make to their projects. Known as the "expanded authorities regulations", the new provisions permit grantees to undertake the following administrative actions without seeking prior approval from the ED program office, unless otherwise specifically stated as part of the grant terms and conditions: (1) obligate funds up to 90 days before the effective date of the grant award (i.e. start of the first budget period); (2) transfer funds among budget line items; (3) carry funds over from one budget period to the next; and (4) extend the grant at the end of the project period for a period up to one year.

Q 5. Can a NRC revise its budget by transferring funds between approved budget line items?

The budget transfer amendment allows NRCs to make budget revisions without prior approval from the Department except for revisions described in EDGAR 75.25(c). NRC grantees are advised to make budget revisions that are reasonable, allowable, and necessary for successful project implementation. Excessive revisions to the project budget indicate potential weaknesses in project planning and administration.

Q 6. Can a NRC add or delete an approved budget line item?

Maybe. Grantees should fax a request for the desired action to the appropriate NRC program officer for review. Requests must include information to justify the added or deleted budget line item and must be signed by the appropriate project official.

Q 7. One of our scheduled NRC activities has to be postponed for completion in another budget period than originally proposed. Is this allowed?

Yes. You can carry over money from Year 1 to Year 2 or from Year 2 to Year 3 to complete an approved activity. However, you cannot carry over money from Year 1 to Year 3.

Q 8. What is the difference between a carry-over of grant funds and a no-cost extension of the project period?

“Carry-over” refers to using funds from Year 1 in Year 2 or funds from Year 2 in Year 3. A “no-cost extension” allows grantees to extend the end date of the project period of their grants for a period of up to 12 months in order to allow extra time to complete activities that are within the approved scope and objectives of the project. A no-cost extension is granted one time only and the extension cannot be used to exhaust unexpended funds i.e. spending “left-over” funds on new activities or the enhancement of approved activities. Please note that if funds are carried over, the award for the next budget period may be reduced by the amount of the carry-over.

Here are the appropriate terms corresponding to funds originally budgeted for each year of the FY 2000-02 grant:

September 1, 2000-August 31, 2001: **carry-over**

September 1, 2001-August 31, 2002: **carry-over**

September 1, 2002-August 31, 2003: **no-cost extension**

CARRY-OVER:

Q 9. For what reason can we use a carry-over of grant funds?

The purpose of a carry-over is to allow you to complete in the next budget period activities within the approved scope of the application that could not take place during the current 12-month budget period.

Q 10. Do I need to submit a request to carry-over funds from Year 1 to Year 2 or from Year 2 to Year 3?

You need to submit a request to carry-over funds only if there is a change in scope.

Q 11. When do we need prior approval for a carry-over of grant funds?

You need prior approval for program or budget administrative actions that would constitute a change in the scope of approved activities (EDGAR 75.25 (b) and (c)). You are encouraged to contact your program officer with questions or concerns regarding the necessity of approval. Please read the Title VI NRC (34 CFR Part 656) regulations carefully.

You do not need prior approval if you have ensured that:

1. The change is for activities that are within the approved scope of the application.
2. The change will not bring priority spending below the amount required for the budget period.
3. The actions taken do not violate federal statutes, regulations, and the grant conditions.
4. Any action taken or expenditure will meet the test of reasonableness, allocability and allowability.
5. All actions and expenditures are well documented and would withstand a review by an auditor or investigative body.
6. The change does not require the need for additional Federal funds.

Q 12. When do I need to submit a carry-over request?

You do not need to request approval for a carry-over unless it involves a change in scope. If you are unsure if the carry-over constitutes a change in scope, please contact your program officer. If it does constitute a change in scope, please submit the request prior to the end of the budget period from which the funds will be carried over.

NO-COST EXTENSION:

Q 13. For what reason can we use a no-cost extension of grant funds?

A NRC may extend the end date of the project period (i.e. at the end of the final budget period) for a period of up to 12 months if additional time is needed to complete already approved activities. The extension cannot be implemented merely for exhausting unexpended funds.

Q 14. Do I need to submit a request for a no-cost extension?

You must submit a letter to NRC staff notifying us of the need for a no-cost extension at least 10, but preferably 30 days prior to the end of the grant period. The letter should include the length of time you need the grant extended and reason(s) for the grant extension. Requests submitted after the end of the project period cannot be processed because expired grants are not able to be amended.

Q. 15. What information do I need to submit with a no-cost extension notification?

At the end of your third year, if you determine a no-cost extension will be necessary to complete approved activities, please mail or fax your program officer a letter, signed by the principal investigator that includes:

- a description of the activities that did not take place during the project period and your plan for completing them during the extension period.
- a budget for the extended grant period (for no-cost extensions, please include the proposed end date).

PRIORITY ACTIVITIES:

Q 16. What are “priority” activities?

“Priority” activities are those activities that meet the absolute priority or any one of the invitational priorities announced in the Federal Register notice for the grant competition under which the application is funded. For the FY 2000-02 cycle, the invitational priority categories have not yet been determined.

Q 17. Is it necessary to include invitational priorities in our application budget?

It is not necessary to include invitational priorities in application budgets as a condition for a grant award under the National Resource Centers program. However, it is advisable, because if the application is funded, grantees whose budgets exhibit exceptional breadth and/or depth of priority activities may receive additional funds for those activities.

Grantees are required to maintain a minimum priority activity funding level on each year's budget. The Priority Activity Funding Level is indicated on the “ED Program Staff Comments” page of the NRC funding documents, and constitutes at least 15% of the overall grant. Program officers evaluate revised budgets to ensure that the minimum amount is spent on priority activities prior to issuing official grant award notifications. It is the grantee's responsibility to ensure that budget revisions do not reduce below the minimum level the total amount actually spent on priority activities.

Q 18. What should we consider if we aren't able to conduct a priority activity?

If the cost of the priority activity is less than the difference between the Priority Activity Funding Level target and the actual amount that you are spending on priority activities, then you can use the money to conduct priority or non-priority NRC activities.

If not conducting the priority activity means that the total amount spent on priority activities will fall below the Priority Activity Funding Level, you must use the money for another priority activity.

FOREIGN TRAVEL:

Q 19. What travel information do we need to include in our budget?

Include the number of trips, purpose of the trip, position of traveler, approximate cost per trip, and (if foreign travel) world area destination. For example:

*4 faculty to Latin America for research, conferences,
study abroad linkages, transportation, per diem @ \$1200/trip* \$4800

Q 20. Do we need to obtain NRC staff approval for foreign travel that is listed in our approved budget?

Yes. NRC staff approval is required prior to all foreign travel that is partially or fully supported by NRC funds.

Q 21. When do we submit requests for travel approvals?

Submit travel approval requests at least 30 days prior to the departure of the traveler. Requests submitted after the deadline might not be approved, and therefore can not be supported with NRC funds. Travelers should be advised not to purchase tickets prior to receiving the official notification from NRC staff approving the travel.

Q 22. Can we obtain retroactive approval for foreign trips already taken?

No. Because NRC staff informs US embassies of upcoming travel, approval is required prior to the departure of the traveler.

Q 23. Do we have to use an American carrier if it would be less expensive to use a foreign airline for the same route?

Yes. Cost-saving is not a valid reason for non-compliance with the requirements of the Fly America Act. All travel supported by federal grants must comply with this law.

Q 24. Since we pay for the ticket in advance, is it OK to fund a trip for which the traveler will depart before the end of the budget period but return after?

Yes. However, if the traveler will be returning after the end of the project period, you must inform NRC staff that a no-cost extension is necessary.

Q 25. *Can we use NRC funds to support student travel?*

Although the program regulations allow the use of NRC money to support *transportation* costs for (a) undergraduates enrolled in a formal program of supervised study, and (b) graduate students traveling to research sites or conferences, **limited grant funds preclude the use of NRC funds for student travel during the FY 2000-02 cycle**. The purpose of the NRC program is to support activities that contribute to the long-term strengthening of the NRC's academic and outreach programs. Support for student travel does not contribute to long-term strengthening of a NRC's programs.

GENERAL ADMINISTRATION:

Q 26. *May we buy a computer for our NRC with grant money?*

Technically, yes. However, **limited grant funds preclude the use of NRC funds for the purchase of standard office equipment during the FY 2000-02 cycle**. Another fact to consider is that the Government Performance and Results Act of 1993 (GPRA), requires the US/ED to assess the effectiveness of its programs. As partners in this endeavor, grantees should expend grant funds for line items that enable them to develop activities that respond to the legislative intent of the NRC program, and that demonstrate grantees' capacity to institutionalize and quantify the success of the activities. Using NRC funds to purchase standard office equipment is an operational activity, and therefore inconsistent with the overall intent of GPRA.

Computers, photocopiers, fax machines and typewriters constitute standard office equipment that should be included in the institution's commitment to the NRC. Using grant funds to purchase these items is not a wise use of grant funds and does not represent an investment in the long-term strengthening of the NRC's instructional or outreach programs. The institution should provide the NRC with all necessary standard office equipment, including equipment for visiting scholars.

Grantees who indicated in their application that their institutions provide standard office equipment, are advised not to use grant funds to purchase equipment because they were allocated evaluation points in response to this information under the selection criterion, "Commitment to the Subject Area on which the Applicant Focuses."

Grantees who did not include equipment in the original application are not allowed to use grant funds for equipment without NRC staff approval since doing so would constitute a change in the approved project scope.

Q 27. *What do we do when we change principal investigators?*

The grantee institution submits a letter requesting the change and includes a recent CV of the new principal investigator. If your institution is part of a consortium, *the lead institution* (actual grant recipient) sends (by fax or mail) to the NRC program officer a letter requesting approval for a change in principal investigator and a recent CV of the new director. The lead institution is then issued a revised Grant Award Notification reflecting the change. **Partner institutions** send a letter and CV to the NRC program officer but do not need to request approval.

Q 28. *Can we use NRC funds to conduct outreach that serves foreign constituencies?*

Outreach activities funded with NRC monies should serve US rather than foreign constituencies because the statute focuses on improving language, area and international studies in the US.

Q 29. *Are ethnic studies relevant to Title VI?*

Generally, no. Ethnic or multicultural studies tend to focus on US society and, therefore, are not eligible for funding under Title VI.

Q 30. *How often can we expect a site visit from NRC program staff?*

While staff would like to be able to visit every grantee during the course of a grant cycle, funding and time constraints prohibit frequent site visits. If schedules and funds permit, staff will notify you in advance of a planned visit to your institution.

Q 31. *NRC staff make 3-year grant recommendations at the beginning of the grant period. Why do we need to submit annual performance reports?*

It is a federal grant program requirement. In compliance with EDGAR, IEGPS staff use the annual performance reports to: (a) monitor grantees' progress toward completion of the approved grant activities in order to recommend continuation funding; (b) make budgetary adjustments; and (c) collect data which allow NRC staff to analyze the impact of the grant programs. Continuation funding decisions are based on (a) information provided in the reports; (b) past performance on US/ED grants; and (c) Congressional appropriations.

Q 32. *Will our NRC automatically receive the funding levels originally recommended for subsequent budget periods?*

No. Funding levels can change due to a variety of factors, including annual Congressional appropriations, grantees' progress toward completion of the grant activities, and grantees' past performance on other US/ED grants.

Q 33. *We have an internal and external review of our NRC every few years, and our students evaluate their courses and instructors. Is this a comprehensive evaluation plan?*

No. These assessments are important elements of a NRC's evaluation plan, but NRCs should also consider instituting mechanisms to evaluate grant-supported projects and services separately. Activities that lend themselves to ongoing evaluation include, but are not limited to: courses, professional development workshops, conferences and lecture series, curricula, instructional and outreach materials development projects, distance learning courses, websites, and teacher resource centers. NRCs should also incorporate evaluative procedures into their oversight arrangements and planning strategies.

CONTACTING NRC STAFF:

Q 34. *Whom do I contact with questions about NRC administration?*

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